

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO, Tax Id. 873220, Individually and in his Official Capacity, ASSISTANT CHIEF PATROL BOROUGH BROOKLYN NORTH GERALD NELSON, Tax Id. 912370, Individually and in his Official Capacity, DEPUTY INSPECTOR STEVEN MAURIELLO, Tax Id. 895117, Individually and in his Official Capacity, CAPTAIN THEODORE LAUTERBORN, Tax Id. 897840, Individually and in his Official Capacity, LIEUTENANT JOSEPH GOUGH, Tax Id. 919124, Individually and in his Official Capacity, SGT. FREDERICK SAWYER, Shield No. 2576, Individually and in his Official Capacity, SERGEANT KURT DUNCAN, Shield No. 2483, Individually and in his Official Capacity, LIEUTENANT CHRISTOPHER BROSCART, Tax Id. 915354, Individually and in his Official Capacity, LT. TIMOTHY CAUGHEY, Tax Id. No. 885374, Individually and in his Official Capacity, SERGEANT SHANTEL JAMES, Shield No. 3004, Individually and in her Official Capacity, SERGEANT RICHARD WALL, Shield No. 3099, Individually and in his Official Capacity, SERGEANT ROBERT W. O'HARE, Tax Id. 916960, Individually and in his Official Capacity, SERGEANT SONDRAL WILSON, Shield No. 5172, Individually and in her Official Capacity, LIEUTENANT THOMAS HANLEY, Tax Id. 879761, Individually and in his Official Capacity, CAPTAIN TIMOTHY TRAINOR Tax Id. 899922, Individually and in his Official Capacity, and P.O.'s "JOHN DOE" #1-50, Individually and in their Official Capacity (the name John Doe being fictitious, as the true names are presently unknown) (collectively referred to as "City Defendants"), FDNY LIEUTENANT ELISE HANLON, individually and in her official capacity as a lieutenant with the New York City Fire Department, JAMAICA HOSPITAL MEDICAL CENTER, DR. ISAK ISAKOV, Individually and in his Official Capacity, DR. LILIAN ALDANA-BERNIER, Individually and in his Official Capacity and JAMAICA HOSPITAL MEDICAL CENTER EMPLOYEE'S "JOHN DOE" # 1-50, Individually and in their Official Capacity (the name John Doe being fictitious, as the true names are presently unknown),

Defendants.  
-----X

**CITY DEFENDANTS'  
NOTICE OF MOTION  
FOR  
RECONSIDERATION  
PURSUANT TO FED. R.  
CIV. P. 60 AND FOR  
BIFURCATION  
PURSUANT TO FED. R.  
CIV. P. 42(B)**

10-CV-6005 (RWS)

**PLEASE TAKE NOTICE** that upon Defendants' City of New York, Deputy Chief Michael Marino, Assistant Chief Gerald Nelson, Captain Theodore Lauterborn, Lieutenant William Gough, Sergeant Frederick Sawyer, Sergeant Kurt Duncan, Lieutenant Christopher Broschart, Lieutenant Timothy Caughey, Lieutenant Shantel James, and FDNY Lieutenant Elise Hanlon (collectively "City defendants") Memorandum of Law dated June 2, 2015, in support of their motion pursuant to Fed. R. Civ. P. 60 and Local Rule 6.2 for partial reconsideration the Court's Order of May 5, 2015, granting in part and denying in part the parties' motions for partial summary judgment pursuant to Fed. R. Civ. P. 56, and of their motion pursuant to Fed. R. Civ. P. 42(b) for bifurcation of the plaintiff's claim against the City of New York under *Monell v. Dep't of Social Services*, 436 U.S. 658 (1978) for the purposes of trial, and upon all prior pleadings and proceedings had herein, City defendants will move this Court, before the Honorable Robert W. Sweet, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on June 23, 2015, or as soon as counsel may be heard, for an Order, granting

**PLEASE TAKE FURTHER NOTICE that** pursuant to Local Rule 6.1 plaintiffs' opposition papers, if any, should be served on the undersigned on or before June 16, 2015; and

**PLEASE TAKE FURTHER NOTICE** that City Defendants' reply papers, if any, shall be served on or before June 23, 2015.

Dated: New York, New York  
June 2, 2015



Docket No 10-CV-6005 (RWS)
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK
ADRIAN SCHOOLCRAFT,  Plaintiff,  -against-  THE CITY OF NEW YORK, et al.,  Defendants.
<b>NOTICE OF MOTION</b>
<b>ZACHARY W. CARTER</b> <i>Corporation Counsel of the City of New York</i> <i>Attorney for City Defendants</i> <i>100 Church Street, Room 3-174</i> <i>New York, New York 10007</i>  <i>Of Counsel: Alan H. Scheiner</i> <i>Tel: (212) 356-2344</i> <i>James Horton</i> <i>Tel: (212) 356-2647</i>
<i>Due and timely service is hereby admitted.</i>  <i>New York, N.Y....., 2014</i>  <i>..... Esq.</i>  <i>Attorney for.....</i>